

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X **Case No.: 12-CV-4460 (HB)**
BRANDI JOHNSON,

Plaintiff,

v.

**DECLARATION OF COUNSEL
IN OPPOSITION OF
DEFENDANTS'
MOTION TO DISMISS**

STRIVE EAST HARLEM EMPLOYMENT GROUP,
LISA STEIN, *Individually*, ROB CARMONA, *Individually*
and PHIL WEINBERG, *Individually*

Defendants.

-----X
JESSENIA MALDONADO, ESQ., declares, pursuant to 28 U.S.C. § 1746 and subject to
the penalties of perjury, that the following is true and correct:

1. I am an attorney duly admitted to practice in the Courts of the State of New York, and in the United States District Court for the Southern and Eastern Districts of New York.
2. I am an Associate with the firm, PHILLIPS & PHILLIPS, PLLC., which represents Plaintiff BRANDI JOHNSON in the above-captioned action. As such, I am fully familiar with the facts and circumstances of this action, the basis of my knowledge being the files maintained by my office.
3. I submit this Declaration in Opposition of Defendants' Motion to Dismiss, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.
4. A copy of Plaintiff's Amended Complaint is attached hereto as Exhibit "A."

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order:

- (i) Denying Defendants' Motion to Dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure; and

(ii) For such other and further relief as this Court may deem just and proper.

Dated: New York, New York
August 20, 2012

PHILLIPS & PHILLIPS, PLLC

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PHILLIPS & PHILLIPS

ATTORNEYS AT LAW

30 BROAD STREET, 35TH FLOOR, NEW YORK, NY 10004